

# BLANK ROME TENZER GREENBLATT LLP

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October 30, 2000

## **BY HAND**

Honorable Stuart M. Bernstein  
Chief United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: In re Randall's Island Family Golf Centers, Inc., et al., (the "Debtors")  
Chapter 11 Case Nos. 00B-41065 through 00B-41196 (SMB)

Dear Judge Bernstein:

We are co-counsel for Trinity Mills-Midway Partners, Ltd. ("Trinity"), the landlord of one of the golf centers leased by the Debtor. This letter is written with the consent of the Debtor's counsel to request a further extension of the time for the parties to complete discovery in connection with Trinity's motion for an order vacating the automatic stay.

By Order dated October 6, 2000, this Court extended the discovery deadline to November 5, 2000. Trinity has taken the deposition of a representative of the Debtor, and the parties have exchanged documents. The remaining discovery involves the depositions of two representatives of Trinity in Dallas, Texas, the deposition of the current on-site manager of the golf center in Dallas, Texas, and a deposition of the former manager of the golf center, which must be taken in Ohio.

Over the past week, the parties have accelerated the pace of settlement discussions. The settlement proposals are significant and are being seriously considered by the parties. However, as a prerequisite to the settlement, it is necessary for representatives of Trinity to engage in further discussions with Klak Golf L.L.C., the third-party entity that has agreed to assume various leases of golf centers from the Debtor. The Klak executives, however, have been unavailable at this time, but should be available within the next two weeks to engage in further discussions.

In light of the fact that the parties believe that the ongoing discussions may lead to a settlement, the parties do not wish to engage in expensive discovery which will involve at least four days of out-of-town depositions. If this discovery must go forward, it will probably diminish the possibility of settlement due to the expense involved. Accordingly, the parties

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respectfully request that this Court grant a further one month extension of time to complete discovery (i.e., until December 5, 2000). We enclose a stipulation for the Court's review and approval.

Respectfully yours,



HARRIS N. COGAN

HNC:jza

Enclosure

cc: Fried, Frank, Harris, Shriver & Jacobson  
Gary Kaplan, Esq.  
Attorneys for Debtor  
Hughes & Luce  
James Billingsley, Esq.  
Co-Counsel for Trinity

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In re

**RANDALL'S ISLAND FAMILY  
GOLF CENTERS, INC., et al.,**

Debtors.

-----X

Chapter 11

Case Nos. 00 B 41065 (SMB)  
Through 00 B 41196 (SMB)  
(Jointly Administered)

**STIPULATED AMENDED SCHEDULING ORDER**

Trinity Mills-Midway Partners, Ltd. ("Trinity Mills"), through its co-counsel, Blank Rome Tenzer Greenblatt LLP and Hughes & Luce, L.L.P., filed a motion dated July 23, 2000 (the "Motion") for an order, pursuant to § 362(d) of Title 11 of the United States Code (the "Bankruptcy Code"), vacating the automatic stay with respect to one of the above-captioned debtors, GBGC Family Golf Centers, Inc. (the "Debtor");

**WHEREAS**, the Debtor filed an objection to the Motion (the "Objection") on July 14, 2000;

**WHEREAS**, a preliminary hearing on the Motion was heard by this Court on July 19, 2000, at which the Court set August 18, 2000 as the date by which discovery must be complete, required that a pretrial order be settled by August 31, 2000, and set a pretrial hearing for September 6, 2000;

**WHEREAS**, this Court entered an order on August 2, 2000 setting forth the discovery schedule (the "Scheduling Order") fixed at the hearing on July 19, 2000;

**WHEREAS**, at the request of the Debtor and Trinity Mills, the Court has entered an Order (the "Revised Scheduling Order") extending the deadlines set forth in the Scheduling Order;

**WHEREAS**, Klak Golf L.L.C. has signed an agreement to purchase the Debtors' interest in certain properties and Klak desires to purchase the Debtors' interest in its lease with Trinity Mills;

**WHEREAS**, the Debtor and Trinity Mills are actively trying reach a settlement on mutually agreeable terms, and the Debtor and Trinity Mills believe that the discovery schedule set forth in the Revised Scheduling Order should be extended to permit the parties to seek to resolve the issues raised in the Motion and the Objection or complete discovery.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for the Debtor and Trinity Mills, as follows:

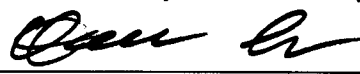
1. All discovery shall be completed by December 6, 2000;
2. The pretrial order in this matter shall be filed by December 20, 2000;
3. The next conference in this matter is scheduled for December 28, 2000 at 10:00 a.m.;
4. The Debtor's time to assume or reject Trinity Mills' lease shall be, and the same hereby is, extended through and including a final hearing on the Motion; and

5. The automatic stay shall remain in effect pending a resolution of the

Motion.

Dated: New York, New York  
October 30, 2000

**BLANK ROME TENZER GREENBLATT LLP**  
Co-Counsel to Trinity Mills-Midway Partners, Ltd.

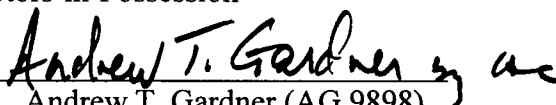
By:   
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-and-

**HUGHES & LUCE, L.L.P.**  
Co-Counsel to Trinity Mills-Midway Partners, Ltd.  
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**ATTORNEYS FOR TRINITY MILLS-  
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**FRIED, FRANK, HARRIS, SHRIVER  
& JACOBSON**  
Attorneys for Debtors and  
Debtors-in-Possession

By:   
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**SO ORDERED:**  
New York, New York  
October \_\_, 2000

**HONORABLE STUART M. BERNSTEIN**  
**CHIEF UNITED STATES BANKRUPTCY JUDGE**

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